HERITAGE-WTI, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

HERITAGE-WTI

OHSAS 18001: 2007 ISO 9001: 2008

ISO 14001: 2004

January 31, 2011
VIA UPS and OEPA AIR SERVICES

Mr. George Czerniak, Chief (UPS)
U.S. EPA Region V
Air Enforcement and Compliance Assurance Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych (Air Services)
OEPA-DAPC-NEDO
2110 E. Aurora Road
Twinsburg, OH 44087

RE: HERITAGE-WTI, INC.
SEMI-ANNUAL STARTUP, SHUTDOWN, AND MALFUNCTION REPORT &
SEMI-ANNUAL EXCESS EMISSIONS AND CMS REPORT

Greetings:

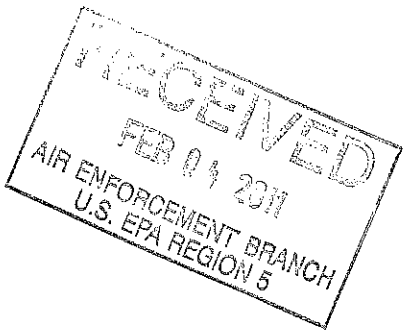
Please find enclosed a written report entitled *Semi-Annual Startup, Shutdown, and Malfunction Report* and *Semi-Annual Excess Emission and CMS Report* for Heritage-WTI, Inc. These reports are required by 40 CFR 63.10 and cover the time period of July 1, 2010 through December 31, 2010.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Frank Murray
General Manager
Heritage-WTI, Inc.



SEMI-ANNUAL STARTUP, SHUTDOWN, AND MALFUNCTION REPORT
&
SEMI-ANNUAL EXCESS EMISSION AND CMS REPORT

for

Heritage-WTI, Inc.

January 31, 2011

Section I – General Information

A. Facility Information

Facility ID:	02-15-02-0233
Responsible Official's Name / Title:	Frank Murray General Manager
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Heritage-WTI, Inc.
Facility Local Contact Name:	Vincent Waggle Environmental Engineer

B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:

63.10(d)(5)(i) – Periodic Startup, Shutdown, and Malfunction Reports

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?

☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3)

Section II – Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Frank Murray, General Manager Date: Jan 24, 2011

Signature: Frank Murray

Section III – Startup, Shutdown, and Malfunction Reports

A. Startup, Shutdown, or Malfunction Actions

All actions taken by Heritage-WTI, Inc. during startup, shutdown, or malfunction events during the reporting period of July 1, 2010 through December 31, 2010 were consistent with the procedures specified in the facility's Startup, Shutdown, and Malfunction Plan.

B. Malfunctions

Please find in the table below a list of each malfunction, the durations, and a brief description of the type of malfunction that occurred during the reporting period of July 1, 2010 through December 31, 2010.

See next page for completed table

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
AWFCO - ESP Not Ready	7/4/2010 6:42:27 PM	7/4/2010 7:44:55 PM	Malfunction - ESP Power Loss	Field #3 shutdown due to overheating of power cabinet	1	2	28	No	Yes	No	No	Yes
ESP Field #3 Current	7/4/2010 7:08:25 PM	7/4/2010 7:41:24 PM	Malfunction - ESP Power Loss	Field #3 shutdown due to overheating of power cabinet	0	32	59	No	Yes	No	No	Yes
THC	7/9/2010 1:02:24 PM	7/9/2010 2:04:23 PM	Malfunction - Prior AWFCO	Prior event caused reduced ability to control combustion.	1	1	59	Yes	No	No	No	Yes
SDA ECIS Flow	7/10/2010 10:17:22 AM	7/10/2010 11:51:23 AM	Malfunction - ECIS Maintenance	Problems with ECIS feed screw caused maintenance shutdown.	1	34	1	No	Yes	No	No	Yes
SDA ECIS Pressure	7/10/2010 10:56:26 AM	7/10/2010 11:19:27 AM	Malfunction - ECIS Maintenance	Problems with ECIS feed screw caused maintenance shutdown.	0	23	1	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/10/2010 11:49:26 PM	7/10/2010 11:49:31 PM	Malfunction - Customer Packaging Error	Improperly packaged material caused poor combustion.	0	0	5	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/10/2010 11:49:35 PM	7/10/2010 11:49:37 PM	Malfunction - Customer Packaging Error	Improperly packaged material caused poor combustion.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/11/2010 11:21:32 AM	7/11/2010 11:21:34 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused pressure spike.	0	0	2	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	7/11/2010 11:21:39 AM	7/11/2010 11:21:41 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused pressure spike.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/12/2010 2:01:48 AM	7/12/2010 2:01:50 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused pressure spike.	0	0	2	No	Yes	No	No	No
THC	7/14/2010 12:07:23 PM	7/14/2010 12:43:21 PM	Malfunction - Lance Slagging	Slagging on lances and front wall caused poor combustion.	0	35	58	Yes	No	No	No	Yes
THC	7/15/2010 3:53:21 AM	7/15/2010 4:39:23 AM	Malfunction - Lance Slagging	Slagging on lances and front wall caused poor combustion.	0	46	2	Yes	No	No	No	Yes
SCC Temperature	7/15/2010 9:49:26 PM	7/15/2010 10:55:24 PM	Malfunction - Gas Burner	Gas burner would not fire above 30 mmBTU to hold temperature.	1	5	58	No	Yes	No	No	Yes
Kiln Temperature	7/15/2010 9:53:25 PM	7/15/2010 10:52:27 PM	Malfunction - Gas Burner	Gas burner would not fire above 30 mmBTU to hold temperature.	0	59	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/15/2010 10:16:34 PM	7/15/2010 10:16:36 PM	Malfunction - Gas Burner	Burner malfunction caused pressure swing and exceedance.	0	0	2	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Temperature	7/16/2010 7:40:26 AM	7/16/2010 8:29:26 AM	Malfunction - Plugged Strainers	Plugged Hi BTU strainer caused temperature loss	0	49	0	No	Yes	No	No	Yes
Kiln Temperature	7/16/2010 7:45:25 AM	7/16/2010 8:28:25 AM	Malfunction - Plugged Strainers	Plugged Hi BTU strainer caused temperature loss	0	43	0	No	Yes	No	No	Yes
Kiln Temperature	7/16/2010 8:57:32 AM	7/16/2010 9:05:30 AM	Malfunction - Lance Slagging	Lance slagging prevented ooperator from maintaining temperature.	0	7	58	No	Yes	No	No	Yes
SCC Temperature	7/16/2010 8:57:34 AM	7/16/2010 9:10:29 AM	Malfunction - Lance Slagging	Lance slagging prevented ooperator from maintaining temperature.	0	12	55	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/17/2010 12:06:00 PM	7/17/2010 12:06:19 PM	Malfunction - Waste Anomaly	Unknown combustion upset caused pressure spike.	0	0	19	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/18/2010 5:08:21 AM	7/18/2010 5:08:23 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused pressure spike.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/19/2010 12:30:45 AM	7/19/2010 12:30:47 AM	Malfunction - Kiln Shroud	Small hole in kiln shround caused inability to maintain draft.	0	0	2	No	Yes	No	No	Yes
THC	7/25/2010 3:21:23 AM	7/25/2010 4:00:22 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused THC spike and exceedance.	0	38	59	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	7/26/2010 2:13:25 PM	7/26/2010 2:13:28 PM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/26/2010 2:13:32 PM	7/26/2010 2:13:45 PM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	13	No	Yes	No	No	Yes
RJ DP	7/29/2010 8:41:24 AM	7/29/2010 8:43:22 AM	Malfunction - Pump Failure	Quench pumps failed to provide flow due to plugging.	0	1	58	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/6/2010 9:10:22 PM	8/6/2010 9:10:26 PM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	4	No	Yes	No	No	Yes
Kiln Temperature	8/8/2010 12:14:27 PM	8/8/2010 12:47:26 PM	Malfunction - Instrument	Slagging on temperature devices caused poor temperature readings.	0	32	59	No	Yes	No	No	Yes
ESP Inlet Temperature	8/8/2010 12:32:26 PM	8/8/2010 12:45:30 PM	Malfunction - Instrument	Atomizer #1 failed causing high ESP temp.	0	13	4	No	Yes	No	No	Yes
THC	8/9/2010 12:31:23 PM	8/9/2010 12:45:24 PM	Malfunction - Lance Purge	Purging of the organic lance caused THC event.	0	14	1	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
THC	8/9/2010 1:04:24 PM	8/9/2010 1:29:23 PM	Malfunction - Lance Purge	Purging of the lances due to tank farm shutdown caused THC event	0	24	59	Yes	No	No	No	Yes
THC	8/10/2010 3:46:24 AM	8/10/2010 4:38:22 AM	Malfunction - Lance Purge	Purging of the organic lance caused THC event	0	51	58	Yes	No	No	No	Yes
SCC Pressure Using Seals	8/10/2010 4:30:36 AM	8/10/2010 4:30:46 AM	Malfunction - Prior AWFCO	Pressure trip occurred while trying to maintain temp.	0	0	10	No	Yes	No	No	Yes
Kiln Temperature	8/10/2010 4:38:26 AM	8/10/2010 4:40:24 AM	Malfunction - Prior AWFCO	Kiln temp dropped due to burner shutdown.	0	1	58	No	Yes	No	No	Yes
THC	8/10/2010 12:27:24 PM	8/10/2010 1:26:23 PM	Malfunction - Lance Slagging	Slag build-up on the lance tip caused poor atomization and combustion.	0	58	59	Yes	No	No	No	Yes
SDA ECIS Flow	8/10/2010 2:07:22 PM	8/10/2010 2:29:24 PM	Malfunction - ECIS Maintenance	Debris caught in carbon feed screw caused flow loss.	0	22	2	No	Yes	No	No	Yes
THC	8/10/2010 3:03:26 PM	8/10/2010 3:57:24 PM	Malfunction - Lance Slagging	Slag build-up on the lance tip caused porr atomization and combustion.	0	53	58	Yes	No	No	No	Yes
THC	8/11/2010 11:58:23 AM	8/11/2010 2:40:23 PM	Malfunction - Unit Shutdown	Unit shutdown due to leak in feed chute.	2	42	0	Yes	No	No	Yes	No

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
Process Gas Flow	8/11/2010 1:00:24 PM	8/11/2010 1:05:24 PM	Malfunction - Unit Shutdown	Unit shutdown due to leak in feed chute.	0	5	0	No	Yes	No	Yes	No
SCC Temperature	8/11/2010 1:40:34 PM	8/11/2010 5:30:21 PM	Malfunction - Unit Shutdown	Unit shutdown due to leak in feed chute.	3	49	47	No	Yes	No	Yes	No
Kiln Temperature	8/11/2010 1:43:29 PM	8/11/2010 5:30:19 PM	Malfunction - Unit Shutdown	Unit shutdown due to leak in feed chute.	3	46	50	No	Yes	No	Yes	No
SDA ECIS Pressure	8/11/2010 1:44:27 PM	8/11/2010 5:30:30 PM	Malfunction - Unit Shutdown	Unit shutdown due to leak in feed chute.	3	46	3	No	Yes	No	Yes	No
RJ DP	8/11/2010 2:11:21 PM	8/11/2010 5:30:27 PM	Malfunction - Unit Shutdown	Unit shutdown due to leak in feed chute.	3	19	6	No	Yes	No	Yes	No
Scrubber ECIS Pressure	8/11/2010 2:13:28 PM	8/11/2010 5:30:32 PM	Malfunction - Unit Shutdown	Unit shutdown due to leak in feed chute.	3	17	4	No	Yes	No	Yes	No
RJ Blowdown Flow	8/11/2010 4:25:22 PM	8/11/2010 5:30:24 PM	Malfunction - Unit Shutdown	Unit shutdown due to leak in feed chute.	1	5	2	No	Yes	No	Yes	No
SCC Pressure Using Seals	8/16/2010 7:11:09 AM	8/16/2010 7:11:11 AM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/16/2010 7:11:16 AM	8/16/2010 7:11:23 AM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	7	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
ESP Field #1 Current	8/17/2010 5:52:27 PM	8/17/2010 5:57:26 PM	Malfunction - Excessive dust	Excessive ash on ESP plates caused low current.	0	4	59	No	Yes	No	No	Yes
ESP Field #1 Current	8/17/2010 6:08:35 PM	8/17/2010 6:11:31 PM	Malfunction - Excessive dust	Excessive ash on ESP plates caused low current.	0	2	56	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/18/2010 7:57:51 AM	8/18/2010 7:57:53 AM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/19/2010 6:56:21 PM	8/19/2010 6:56:24 PM	Malfunction - Waste Anomaly	Unknown combustionupset caused pressure spike.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/20/2010 4:09:17 AM	8/20/2010 4:09:22 AM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	5	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/21/2010 7:50:32 AM	8/21/2010 7:50:34 AM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/21/2010 3:56:13 PM	8/21/2010 3:56:15 PM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/21/2010 3:56:23 PM	8/21/2010 3:56:28 PM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	5	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	8/25/2010 9:21:49 PM	8/25/2010 9:21:52 PM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/27/2010 7:20:18 AM	8/27/2010 7:20:22 AM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	4	No	Yes	No	No	Yes
Scrubber pH	8/30/2010 1:48:29 PM	8/30/2010 3:22:30 PM	Malfunction - Caustic Feed	unit shutdown to repair hole in caustic line.	1	34	1	No	Yes	No	No	Yes
THC	8/30/2010 4:53:30 PM	8/30/2010 5:51:28 PM	Malfunction - Instrument Malfunction	Gas burner malfunction caused THC spike.	0	57	58	Yes	No	No	No	Yes
Kiln Temperature	8/30/2010 5:30:31 PM	8/30/2010 6:24:29 PM	Malfunction - Instrument Malfunction	Gas burner malfunction cause inability to hold temperature.	0	53	58	No	Yes	No	No	Yes
Scrubber pH	8/31/2010 6:33:28 PM	8/31/2010 8:09:29 PM	Malfunction - Caustic Feed	unit shutdown to repair hole in caustic line.	1	36	1	No	Yes	No	No	Yes
THC	8/31/2010 8:52:30 PM	8/31/2010 9:19:29 PM	Malfunction - Waste Anomaly	Unknown combustion upset caused pressure spike.	0	26	59	Yes	No	No	No	Yes
SCC Pressure Using Seals	9/1/2010 10:25:36 AM	9/1/2010 10:25:39 AM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	3	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	9/5/2010 2:53:39 AM	9/5/2010 2:53:43 AM	Malfunction - Clinker Fell	Ash fall from SCC into quench cause rapid pressure spike.	0	0	4	No	Yes	No	No	Yes
Kiln Temperature	9/6/2010 5:52:26 AM	9/6/2010 6:27:25 AM	Malfunction - Lance Slagging	Slag build-up on lances preventing operator from maintaining temp.	0	34	59	No	Yes	No	No	Yes
THC	9/6/2010 4:07:23 PM	9/6/2010 4:44:22 PM	Malfunction - Lance Slagging	Slag build-up on the lance tip caused poor atomization and combustion.	0	36	59	Yes	No	No	No	Yes
SCC Pressure Using Seals	9/6/2010 4:35:04 PM	9/6/2010 4:35:09 PM	Malfunction - Instrument Malfunction	Gas burner malfunction caused pressure spike.	0	0	5	No	Yes	No	No	Yes
Kiln Temperature	9/6/2010 4:42:24 PM	9/6/2010 5:00:25 PM	Malfunction - Instrument Malfunction	Loss of burner caused temperature drop.	0	18	1	No	Yes	No	No	Yes
Scrubber pH	9/11/2010 3:18:31 PM	9/11/2010 3:19:40 PM	Malfunction - Instrument Malfunction	PH probe reading incorrectly.	0	1	9	No	Yes	No	No	Yes
THC	9/11/2010 11:52:26 PM	9/12/2010 12:54:25 AM	Malfunction - Lance Purge	Purge from sludge lance caused THC spike.	1	1	59	Yes	No	No	No	Yes
Kiln Temperature	9/12/2010 12:30:27 AM	9/12/2010 1:04:32 AM	Malfunction - Instrument Malfunction	Gas burner malfunction cause inability to hold temperature.	0	34	5	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
THC	9/12/2010 1:30:26 AM	9/12/2010 2:29:24 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused pressure spike.	0	58	58	Yes	No	No	No	Yes
THC	9/12/2010 5:48:24 AM	9/12/2010 6:49:24 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused pressure spike.	1	1	0	Yes	No	No	No	Yes
Kiln Temperature	9/12/2010 12:12:26 PM	9/12/2010 2:21:15 PM	Malfunction - Instrument Malfunction	Gas burner malfunction cause inability to hold temperature.	2	8	49	No	Yes	No	No	Yes
SCC Temperature	9/12/2010 12:25:26 PM	9/12/2010 2:21:18 PM	Malfunction - Instrument Malfunction	Gas burner malfunction cause inability to hold temperature.	1	55	52	No	Yes	No	No	Yes
RJ DP	9/12/2010 1:43:22 PM	9/12/2010 2:21:20 PM	Malfunction - Prior AWFCO	Process flow low during AWFCO.	0	37	58	No	Yes	No	No	Yes
THC	9/13/2010 12:00:23 AM	9/13/2010 12:59:22 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused pressure spike.	0	58	59	Yes	No	No	No	Yes
SCC Pressure Using Seals	9/15/2010 5:51:25 PM	9/15/2010 5:51:31 PM	Malfunction - Instrument Malfunction	Burner start-up caused slight pressure spike.	0	0	6	No	Yes	No	No	Yes
THC	9/18/2010 4:04:22 AM	9/18/2010 5:01:22 AM	Malfunction - Boiler Tube Leak	Boiler tube leak causing periodic combustion problems.	0	57	0	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
THC	9/18/2010 5:55:23 PM	9/18/2010 6:34:22 PM	Malfunction - Boiler Tube Leak	Boiler tube leak causing periodic combustion problems	0	38	59	Yes	No	No	No	Yes
THC	9/18/2010 7:09:24 PM	9/18/2010 8:08:21 PM	Malfunction - Boiler Tube Leak	Boiler tube leak causing periodic combustion problems	0	58	57	Yes	No	No	No	Yes
THC	9/18/2010 9:34:23 PM	9/18/2010 10:33:23 PM	Malfunction - Boiler Tube Leak	Boiler tube leak causing periodic combustion problems	0	59	0	Yes	No	No	No	Yes
RJ DP	9/19/2010 1:47:22 PM	9/19/2010 5:07:32 PM	Malfunction - Equipment Malfunction	Unit shutdown to repair ring jet header.	3	20	10	No	Yes	No	Yes	No
RJ Flow	9/19/2010 1:48:24 PM	9/19/2010 4:12:20 PM	Malfunction - Equipment Malfunction	Unit shutdown to repair ring jet header.	2	23	56	No	Yes	No	Yes	No
RJ Blowdown Flow	9/19/2010 2:25:21 PM	9/19/2010 3:36:21 PM	Malfunction - Equipment Malfunction	Unit shutdown to repair ring jet header.	1	11	0	No	Yes	No	Yes	No
Kiln Temperature	9/19/2010 3:46:24 PM	9/19/2010 5:07:27 PM	Malfunction - Equipment Malfunction	Unit shutdown to repair ring jet header.	1	21	3	No	Yes	No	Yes	No
SCC Temperature	9/19/2010 3:47:25 PM	9/19/2010 5:07:29 PM	Malfunction - Equipment Malfunction	Unit shutdown to repair ring jet header.	1	20	4	No	Yes	No	Yes	No
ESP Inlet Temperature	9/24/2010 6:20:27 PM	9/24/2010 7:27:29 PM	Malfunction - Plugged Atomizer	Plugged atomizers caused high ESP inlet temp.	1	7	2	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
ESP Inlet Temperature	9/24/2010 7:31:31 PM	9/24/2010 7:47:28 PM	Malfunction - Plugged Atomizer	Plugged atomizers caused high ESP inlet temp.	0	15	57	No	Yes	No	No	Yes
THC	9/24/2010 8:50:21 PM	9/24/2010 9:00:23 PM	Malfunction - Waste Anomaly	Unknown combustion upset caused THC event.	0	10	2	Yes	No	No	No	Yes
THC	9/27/2010 3:01:24 PM	9/27/2010 3:28:21 PM	Malfunction - Waste Anomaly	Unknown combustion upset caused THC event.	0	26	57	Yes	No	No	No	Yes
SCC Pressure Using Seals	9/28/2010 4:37:50 PM	9/28/2010 4:37:53 PM	Malfunction - Clinker Fell	Ash fall from SCC caused pressure spike and fan loss.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	9/28/2010 4:37:58 PM	9/28/2010 4:38:11 PM	Malfunction - Clinker Fell	Ash fall from SCC caused pressure spike and fan loss.	0	0	13	No	Yes	No	No	Yes
THC	9/28/2010 4:42:28 PM	9/28/2010 5:41:30 PM	Malfunction - Clinker Fell	Ash fall from SCC caused fan loss and THC.	0	59	2	Yes	No	No	No	Yes
SCC Pressure Using Seals	9/30/2010 11:35:19 PM	9/30/2010 11:35:22 PM	Malfunction - Clinker Fell	Ash fall from SCC caused pressure spike.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/1/2010 12:36:44 PM	10/1/2010 12:36:46 PM	Malfunction - Boiler Plugging	System plugging causing an inability to control pressure spikes	0	0	2	No	Yes	No	No	Yes
THC	10/2/2010 11:11:23 PM	10/3/2010 12:06:22 AM	Malfunction - Boiler Plugging	System plugging causing an inability to add combustion air.	0	54	59	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
Kiln Temperature	10/3/2010 12:33:25 PM	10/3/2010 1:15:25 PM	Malfunction - Instrument	Oil in purge lines for temperature lasers causing false temperature readings.	0	42	0	No	Yes	No	No	Yes
THC	10/3/2010 3:21:24 PM	10/3/2010 4:20:22 PM	Malfunction - Boiler Plugging	System plugging causing an inability to add combustion air.	0	58	58	Yes	No	No	No	Yes
SCC Pressure Using Seals	10/3/2010 3:24:43 PM	10/3/2010 3:24:47 PM	Malfunction - Boiler Plugging	System plugging causing an inability to control pressure spikes	0	0	4	No	Yes	No	No	Yes
THC	10/4/2010 8:21:24 PM	10/4/2010 9:21:22 PM	Malfunction - Customer Packaging Error	Improperly packaged material caused poor combustion.	0	59	58	Yes	No	No	No	Yes
Process Gas Flow	10/6/2010 6:58:24 AM	10/6/2010 7:22:22 AM	Malfunction - Air In-leakage	Process flow increased to overcome air in-leakage during maintenance.	0	23	58	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/7/2010 1:17:49 AM	10/7/2010 1:17:51 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused pressure spike.	0	0	2	No	Yes	No	No	Yes
THC	10/7/2010 9:32:22 AM	10/7/2010 10:28:24 AM	Malfunction - Boiler Plugging	System plugging causing an inability to add combustion air.	0	56	2	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	10/7/2010 1:53:00 PM	10/7/2010 1:53:13 PM	Malfunction - Instrument	Boiler level switch malfunction cause ID Fan shutdown.	0	0	13	No	Yes	No	No	Yes
THC	10/7/2010 1:54:22 PM	10/7/2010 2:58:22 PM	Malfunction - Instrument	Boiler level switch malfunction cause ID Fan shutdown.	1	4	0	Yes	No	No	No	Yes
THC	10/7/2010 7:51:23 PM	10/7/2010 7:53:24 PM	Malfunction - Lance Slagging	Slagging on the lances causing poor combustion.	0	2	1	Yes	No	No	No	Yes
THC	10/8/2010 3:11:22 AM	10/8/2010 4:10:23 AM	Malfunction - Lance Slagging	Slagging on the lances causing poor combustion.	0	59	1	Yes	No	No	No	Yes
SCC Pressure Using Seals	10/12/2010 1:27:48 PM	10/12/2010 1:27:52 PM	Malfunction - System Plugging	System plugging causing an inability to control pressure spikes	0	0	4	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/17/2010 12:31:16 AM	10/17/2010 12:31:19 AM	Malfunction - System Plugging	Ash build-up causing reduced draft and inability to control spikes.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/17/2010 1:53:56 AM	10/17/2010 1:53:58 AM	Malfunction - System Plugging	Ash build-up causing reduced draft and inability to control spikes.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/17/2010 2:40:11 AM	10/17/2010 2:40:15 AM	Malfunction - System Plugging	Ash build-up causing reduced draft and inability to control spikes.	0	0	4	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
Scrubber pH	11/3/2010 12:55:40 AM	11/3/2010 1:21:42 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	26	2	No	Yes	No	No	Yes
Total PB DP	11/3/2010 12:55:43 AM	11/3/2010 1:05:41 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	9	58	No	Yes	No	No	Yes
Total PB Flow	11/3/2010 12:55:45 AM	11/3/2010 1:02:40 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	6	55	No	Yes	No	No	Yes
RJ DP	11/3/2010 12:55:48 AM	11/3/2010 1:17:40 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	21	52	No	Yes	No	No	Yes
RJ Blowdown Flow	11/3/2010 12:55:50 AM	11/3/2010 1:20:43 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	24	53	No	Yes	No	No	Yes
RJ Flow	11/3/2010 12:55:52 AM	11/3/2010 1:07:43 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	11	51	No	Yes	No	No	Yes
ESP Field #1 Current	11/3/2010 12:55:55 AM	11/3/2010 1:59:40 AM	Malfunction - Instrument Malfunction	ESP controller malfunction led to unit shutdown.	1	3	45	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
RJ Sump Level	11/3/2010 12:55:57 AM	11/3/2010 1:12:49 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	16	52	No	Yes	No	No	Yes
Kiln Temperature	11/3/2010 12:56:00 AM	11/3/2010 1:18:49 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	22	49	No	Yes	No	No	Yes
SCC Temperature	11/3/2010 12:56:02 AM	11/3/2010 1:22:46 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	26	44	No	Yes	No	No	Yes
Scrubber ECIS Flow	11/3/2010 1:23:42 AM	11/3/2010 2:10:38 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	46	56	No	Yes	No	No	Yes
RJ Blowdown Flow	11/3/2010 1:28:37 AM	11/3/2010 2:26:37 AM	Malfunction - Instrument Malfunction	Data retrieval issue during malfunction caused OPL exceedances.	0	58	0	No	Yes	No	No	Yes
ESP Field #1 Current	11/3/2010 5:26:49 AM	11/3/2010 7:30:34 AM	Malfunction - Instrument Malfunction	ESP controller malfunction led to unit shutdown.	2	3	45	No	Yes	No	No	Yes
ESP Field #1 Current	11/3/2010 8:17:27 AM	11/3/2010 9:17:26 AM	Malfunction - Instrument Malfunction	ESP controller malfunction led to unit shutdown.	0	59	59	No	Yes	No	No	Yes
ESP Field #1 Current	11/3/2010 9:42:35 AM	11/3/2010 9:48:35 AM	Malfunction - Instrument Malfunction	ESP controller malfunction led to unit shutdown.	0	6	0	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	11/3/2010 7:05:39 PM	11/3/2010 7:06:08 PM	Malfunction - ID Fan Trip	Instrument malfunction caused ID Fan trip and OPL loss.	0	0	29	No	Yes	No	No	Yes
SCC Pressure Using Seals	11/3/2010 7:31:16 PM	11/3/2010 7:31:29 PM	Malfunction - ID Fan Trip	Instrument malfunction caused ID Fan trip and OPL loss.	0	0	13	No	Yes	No	No	Yes
SCC Temperature	11/3/2010 7:37:33 PM	11/3/2010 8:09:29 PM	Malfunction - ID Fan Trip	Instrument malfunction caused ID Fan trip and OPL loss.	0	31	56	No	Yes	No	No	Yes
RJ DP	11/3/2010 8:00:24 PM	11/3/2010 8:08:25 PM	Malfunction - ID Fan Trip	Instrument malfunction caused ID Fan trip and OPL loss.	0	8	1	No	Yes	No	No	Yes
SCC Pressure Using Seals	11/11/2010 2:53:54 PM	11/11/2010 2:53:58 PM	Malfunction - Clinker Fell	Ash fall from SCC to quench caused rapid pressure spike.	0	0	4	No	Yes	No	No	Yes
SCC Pressure Using Seals	11/11/2010 2:54:01 PM	11/11/2010 2:54:07 PM	Malfunction - Clinker Fell	Ash fall from SCC to quench caused rapid pressure spike.	0	0	6	No	Yes	No	No	Yes
THC	11/11/2010 2:58:22 PM	11/11/2010 3:57:21 PM	Malfunction - Clinker Fell	Ash fall from SCC to quench caused THC spike.	0	58	59	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	11/12/2010 12:25:22 PM	11/12/2010 12:25:25 PM	Malfunction - Clinker Fell	Ash fall from SCC to quench caused rapid pressure spike.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	11/17/2010 10:49:24 PM	11/17/2010 10:49:27 PM	Malfunction - Instrument Malfunction	During other WFCO, bruner caused pressure spikes.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	11/17/2010 10:58:49 PM	11/17/2010 10:58:53 PM	Malfunction - Instrument Malfunction	During other WFCO, bruner caused pressure spikes.	0	0	4	No	Yes	No	No	Yes
THC	11/20/2010 11:55:26 AM	11/20/2010 12:21:28 PM	Malfunction - Boiler Tube Leak	Boiler tube leak caused poor combustion and THC.	0	26	2	Yes	No	No	No	Yes
THC	11/26/2010 11:08:24 AM	11/26/2010 11:52:24 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused THC event.	0	44	0	Yes	No	No	No	Yes
THC	12/5/2010 2:13:26 AM	12/5/2010 3:11:26 AM	Malfunction - Lance Slagging	Slagging on the Organic lance causing poor combustion and THC.	0	58	0	Yes	No	No	No	Yes
Kiln Temperature	12/5/2010 12:10:26 PM	12/5/2010 3:32:17 PM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	3	21	51	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Temperature	12/5/2010 12:14:26 PM	12/5/2010 3:32:19 PM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	3	17	53	No	Yes	No	No	Yes
ESP Field #2 Current	12/5/2010 12:16:25 PM	12/5/2010 3:32:29 PM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	3	16	4	No	Yes	No	No	Yes
RJ DP	12/5/2010 12:18:23 PM	12/5/2010 3:32:24 PM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	3	14	1	No	Yes	No	No	Yes
ESP Field #3 Current	12/5/2010 12:19:24 PM	12/5/2010 12:29:26 PM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	0	10	2	No	Yes	No	No	Yes
ESP Field #1 Current	12/5/2010 12:24:26 PM	12/5/2010 3:09:27 PM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	2	45	1	No	Yes	No	No	Yes
ESP Field #3 Current	12/5/2010 12:33:25 PM	12/5/2010 12:36:25 PM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	0	3	0	No	Yes	No	No	Yes
THC	12/5/2010 12:34:23 PM	12/5/2010 2:48:24 PM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	2	14	1	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
ESP Field #3 Current	12/5/2010 12:42:26 PM	12/5/2010 3:11:25 PM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	2	28	59	No	Yes	No	No	Yes
RJ Blowdown Flow	12/5/2010 2:19:21 PM	12/5/2010 3:32:22 PM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	1	13	1	No	Yes	No	No	Yes
RJ DP	12/6/2010 5:49:22 AM	12/6/2010 5:49:43 AM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	0	0	21	No	Yes	No	No	Yes
RJ Blowdown Flow	12/6/2010 5:49:25 AM	12/6/2010 5:49:40 AM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	0	0	15	No	Yes	No	No	Yes
Kiln Temperature	12/6/2010 5:49:31 AM	12/6/2010 5:49:35 AM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	0	0	4	No	Yes	No	No	Yes
SCC Temperature	12/6/2010 5:49:33 AM	12/6/2010 5:49:38 AM	Malfunction - Instrument	ESP shutdown due to low field power cause by controller malfunction.	0	0	5	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/12/2010 12:06:33 PM	12/12/2010 12:06:36 PM	Malfunction - Clinker	Ash fall from SCC to quench caused rapid pressure spike.	0	0	3	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
THC	12/14/2010 5:25:22 AM	12/14/2010 6:22:22 AM	Malfunction - Waste Anomaly	Unknown combustion upset caused THC event.	0	57	0	Yes	No	No	No	Yes
THC	12/14/2010 7:49:23 AM	12/14/2010 8:48:21 AM	Malfunction - Customer Packaging Error	Improperly packaged material caused poor combustion.	0	58	58	Yes	No	No	No	Yes
SCC Temperature	12/16/2010 10:12:27 AM	12/16/2010 10:18:31 AM	Malfunction - Steam Loss	Steam line repair necessitated fuel oil lance shutdown.	0	6	4	No	Yes	No	No	Yes
THC	12/18/2010 8:21:24 AM	12/18/2010 9:19:22 AM	Malfunction - Lance Purge	Purge of organic lance on startup caused THC.	0	57	58	Yes	No	No	No	Yes
THC	12/19/2010 12:08:22 PM	12/19/2010 12:48:21 PM	Malfunction - Instrument Problems	Instrument problems caused high THC readings	0	39	59	Yes	No	No	No	Yes
SDA ECIS Flow	12/19/2010 7:57:24 PM	12/19/2010 8:01:21 PM	Malfunction - ECIS Maintenance	Plugging in carbon screw cause low low flow	0	3	57	No	Yes	No	No	Yes
THC	12/21/2010 6:55:29 PM	12/21/2010 7:55:28 PM	Malfunction - Waste Anomaly	Unknown combustion upset caused THC event.	0	59	59	Yes	No	No	No	No
THC	12/22/2010 10:16:27 AM	12/22/2010 12:54:29 PM	Malfunction - Emergency Shutdown	Emergency shutdown following SCC pressure incident	2	38	2	Yes	No	No	No	No
SCC Temperature	12/22/2010 10:20:30 AM	12/22/2010 1:09:41 PM	Malfunction - Emergency Shutdown	Emergency shutdown following SCC pressure incident	2	49	11	No	Yes	No	Yes	No

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
Kiln Temperature	12/22/2010 10:26:25 AM	12/22/2010 1:09:39 PM	Malfunction - Emergency Shutdown	Emergency shutdown following SCC pressure incident	2	43	14	No	Yes	No	Yes	No
SDA ECIS Flow	12/22/2010 10:39:23 AM	12/22/2010 1:09:46 PM	Malfunction - Emergency Shutdown	Emergency shutdown following SCC pressure incident	2	30	23	No	Yes	No	Yes	No
Process Gas Flow	12/22/2010 11:08:23 AM	12/22/2010 11:33:30 AM	Malfunction - Emergency Shutdown	Emergency shutdown following SCC pressure incident	0	25	7	No	Yes	No	Yes	No
SDA ECIS Pressure	12/22/2010 11:15:24 AM	12/22/2010 1:09:48 PM	Malfunction - Emergency Shutdown	Emergency shutdown following SCC pressure incident	1	54	24	No	Yes	No	Yes	No
Scrubber ECIS Pressure	12/22/2010 11:21:31 AM	12/22/2010 1:09:50 PM	Malfunction - Emergency Shutdown	Emergency shutdown following SCC pressure incident	1	48	19	No	Yes	No	Yes	No
RJ Blowdown Flow	12/22/2010 12:41:28 PM	12/22/2010 1:09:43 PM	Malfunction - Emergency Shutdown	Emergency shutdown following SCC pressure incident	0	28	15	No	Yes	No	Yes	No
THC	12/30/2010 9:41:30 PM	12/30/2010 10:40:30 PM	Malfunction - Lance Slagging	Slag build-up on the organic lance caused poor combustion.	0	59	0	Yes	No	No	No	Yes

C. Startup, Shutdown, or Malfunction Plan Revision History

DATE	Revision Number	Comment
9/30/2003	0	Initial Plan
2/27/2004	1	ESP OPLs added. Malfunction list updated.
6/23/2005	2	Revised section on operating modes.
10/27/2006	3	RCRA Permit modifications. Malfunction list updated.
3/15/2007	4	Malfunction list updated and comments added addressing instances beyond the operator's control.
6/6/2007	5	Malfunction list updated and further comments added addressing instances beyond the operator's control.
10/16/2007	6	Corrected minor deficiencies noted by OEPA.
9/1/2008	7	Revised to reflect facility name change
6/12/2009	8	This revision included, in Section 1.6.3.1, more detailed descriptions of the most common malfunction events that occur at the facility. It also included a description of data collection procedures during times when residence time expires while an exceedance event is taking place in Section 1.6.3.

SEMI-ANNUAL EXCESS EMISSION AND CMS REPORT

Section I – General Information

A. Facility Information

Facility ID:	02-15-0233
Responsible Official's Name / Title:	Frank Murray / Vice President & General Manager
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Heritage-WTI, Inc.
Facility Local Contact Name:	Local contact is the same information as given above.

B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:

63.10(e)(3) – Excess Emissions and Continuous Monitoring System Performance Report

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?

☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3))

D. Check the box that corresponds to the reports you are submitting:

☐ Summary Report Only (Complete Sections II and IV)

☒ Excess Emission and CMS Performance Report and Summary Report (Complete Sections II, III, and IV).

Section II – Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Frank Murray, General Manager Date: Jan 24, 2011

Signature: Frank Murray

Section III – Excess Emissions and CMS Performance Report

A. Excess Emissions

1. Have any excess emissions or exceedances of a parameter occurred during this reporting period?
☒ Yes ☐ No

2. If you answered yes, complete the following table for each period of excess emissions and/or parameter monitoring exceedances, as defined in the relevant standard(s), that occurred during startups, shutdowns, and/or malfunctions of your affected source, or during periods other than startups, shutdowns, and/or malfunctions of your affected source. (63.10(c)(7)-(11))

See next page for completed table.

Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
THC	7/8/2010 1:34:22 AM	7/8/2010 2:19:21 AM	Operator Error - Feed Prep	Improper feed prep caused poor combustion	reduce charge size. Restart unit.	0	44	59
SCC Pressure Using Seals	7/9/2010 12:58:49 PM	7/9/2010 12:58:53 PM	Operator Error - Feed Prep	Improper feed prep caused poor combustion	Restarted unit. Reduced charge size.	0	0	4
SCC Pressure Using Seals	7/9/2010 12:58:57 PM	7/9/2010 12:59:01 PM	Operator Error - Feed Prep	Improper feed prep caused poor combustion	Restarted unit. Reduced charge size.	0	0	4
SCC Pressure Using Seals	7/10/2010 8:42:11 PM	7/10/2010 8:42:18 PM	Operator Error - Feed Prep	Improper feed prep caused poor combustion	Restarted unit. Prep altered.	0	0	7
THC	7/13/2010 9:22:23 PM	7/13/2010 10:24:22 PM	Operator Error - Feed Prep	Improperly packaged material caused poor combustion.	Restarted unit. Reduced charge size.	1	1	59
SCC Pressure Using Seals	7/14/2010 12:39:58 AM	7/14/2010 12:40:00 AM	Operator Error - Feed Prep	Improperly packaged material caused pressure spike.	Maintained draft using ID Fan damper.	0	0	2
THC	7/17/2010 8:41:22 AM	7/17/2010 9:39:22 AM	Operator Error - Feed Prep	Improperly packaged material caused pressure spike.	Restarted unit. Reduced charge size.	0	58	0
THC	7/22/2010 8:10:26 PM	7/22/2010 9:13:26 PM	Operator Error-Poor Operation	Lack of combustion air caused poor combustion and THC.	Increase primary air flow. Restarted unit.	1	3	0
THC	8/1/2010 11:54:24 AM	8/1/2010 12:22:25 PM	Operator Error - Feed Prep	Improperly packaged material caused pressure spike.	Restarted unit. Reduced charge size.	0	28	1
THC	8/2/2010 7:41:24 PM	8/2/2010 8:39:24 PM	Operator Error - Feed Mix	Waste stream fed with incompatable materials causing poor combustion.	Restarted unit. Revised feed instructions.	0	58	0

Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
Kiln Temperature	8/4/2010 6:14:28 PM	8/4/2010 6:23:27 PM	Operator Error-Poor Operation	Operator failed to take corrective action to prevent exceedance.	Temperature re-established. Unit restarted.	0	8	59
THC	8/10/2010 6:55:24 PM	8/10/2010 7:53:25 PM	Operator Error - Feed Prep	Improperly packaged material caused pressure spike.	Restarted unit. Reduced charge size.	0	58	1
THC	8/13/2010 3:51:27 PM	8/13/2010 3:58:23 PM	Operator Error - Feed Prep	Improperly packaged material caused pressure spike.	Restarted unit. Reduced charge size.	0	6	56
THC	8/16/2010 7:57:27 PM	8/16/2010 8:58:26 PM	Operator Error - Feed Prep	Improperly packaged material caused pressure spike.	Restarted unit. Reduced charge size.	1	0	59
SCC Pressure Using Seals	8/20/2010 4:24:38 AM	8/20/2010 4:24:44 AM	Operator Error - Feed Prep	Improperly prepared material caused pressure spike.	Restarted unit. Reviewed instructions.	0	0	6
THC	8/21/2010 11:14:24 PM	8/22/2010 12:05:24 AM	Operator Error - Feed Mix	Poor feed mix caused THC spike.	Restart unit. Revise feed mix.	0	51	0
RJ DP	8/22/2010 12:15:24 AM	8/22/2010 12:22:23 AM	Operator Error - Poor Operation	Operator failed to adjust to pressure drop.	Re-established OPL. Restarted unit.	0	6	59
THC	9/13/2010 2:27:21 AM	9/13/2010 3:26:22 AM	Operator Error - Poor Operation	operator failed to add enough combustion air.	Increased air flow. Restarted unit.	0	59	1
THC	9/22/2010 5:55:26 AM	9/22/2010 7:02:23 AM	Operator Error - Feed Prep	Heavy drum feed caused THC spike.	Charge size reduced. Unit restarted.	1	6	57
THC	9/22/2010 11:12:25 AM	9/22/2010 12:12:22 PM	Operator Error - Feed Prep	Heavy drum feed caused THC spike.	Charge size reduced. Unit restarted.	0	59	57
Kiln Temperature	9/22/2010 11:36:27 AM	9/22/2010 11:46:26 AM	Operator Error-Poor Operation	Operator failed to maintain temperature.	Regained temp. Restarted unit.	0	9	59

Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
THC	9/23/2010 10:15:23 PM	9/23/2010 11:15:23 PM	Operator Error - Feed Mix	Poor feed mix lead to THC exceedance.	Altered feed mix. Restarted unit.	1	0	0
THC	9/28/2010 7:30:24 AM	9/28/2010 8:28:22 AM	Operator Error - Feed Prep	Feed prep error caused poor combustion and THC.	Reduced charge size. Restarted unit.	0	57	58
THC	9/29/2010 9:11:29 AM	9/29/2010 9:14:29 AM	Operator Error - Feed Prep	Feed prep error caused poor combustion and THC.	Reduced charge size. Restarted unit.	0	3	0
THC	10/11/2010 1:58:22 AM	10/11/2010 2:00:22 AM	Operator Error - Feed Prep	Feed prep error caused poor combustion and THC.	Reduced charge size. Restarted unit.	0	2	0
THC	11/3/2010 5:18:30 PM	11/3/2010 5:46:29 PM	Operator Error - Poor Operation	Operator left hopper fill valve 100% open during purge.	Adjusted valve. Restarted unit.	0	27	59
THC	11/4/2010 11:23:24 AM	11/4/2010 12:22:24 PM	Operator Error - Poor Operation	Operator brought slurry lance in too hard causing THC.	Reduced feed rate. Restarted unit.	0	59	0
THC	11/13/2010 7:04:22 AM	11/13/2010 8:02:22 AM	Operator Error- Feed Prep	Improper feed prep led to THC spike.	Restarted unit. Reduced charge size.	0	58	0
Kiln Temperature	11/17/2010 10:45:31 PM	11/17/2010 11:00:31 PM	Operator Error - Poor Operation	Thick fuel oil cause low flow and temperature exceedance.	Regained temp and restarted unit. Blended oil.	0	15	0
THC	11/24/2010 11:42:30 PM	11/25/2010 12:32:29 AM	Operator Error- Feed Prep	Improper feed prep led to THC spike.	Restarted unit. Reduced charge size.	0	49	59
THC	11/25/2010 2:16:28 AM	11/25/2010 2:55:29 AM	Operator Error- Feed Prep	Improper feed prep led to THC spike.	Restarted unit. Reduced charge size.	0	39	1
THC	11/30/2010 1:14:23 AM	11/30/2010 1:48:22 AM	Operator Error- Feed Prep	Improper feed prep led to THC spike.	Restarted unit. Reduced charge size.	0	33	59

Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
SCC Pressure Using Seals	12/22/2010 10:12:22 AM	12/22/2010 10:13:08 AM	Operator Error - Feed Prep	Improper waste feed caused large pressure disturbance and shutdown.	Initiated unit shutdown. Maintained draft.	0	0	46
THC	12/31/2010 4:01:29 PM	12/31/2010 5:00:28 PM	Operator Error - Feed Prep	Improper waste feed caused poor combustion.	Reduced charge size and restarted unit.	0	58	59

B. CMS Performance

1. Has a CMS been inoperative (except for zero/low-level and high-level checks), out of control (as defined in 63.8(c)(7)(i)), repaired, or adjusted during this reporting period? ☒ Yes ☐ No

2. If you answered yes, complete the following table for each period a CMS was out of control, repaired, or adjusted: (63.10(c)(5)-(6), (10)-(12); 63.8(c)(8).

CMS Type	Mfg	Process ID	Start Date	Completion Date	Nature & Cause of Malfunction (if any)	Corrective Actions Taken or Preventative Measures Adopted	Nature of Repairs or Adjustments Made to Inoperable or OOC CMS
Dry O2	CAI	Stack monitor #2	9/11/2010	9/12/2010	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #2	8/7/2010	8/8/2010	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #2	9/11/2010	9/12/2010	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #2	9/16/2010	9/17/2010	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #2	9/18/2010	9/19/2010	Instrument Drift	Manual Calibration	Manual Calibration
Process Flow	CAI	Scrubber Outlet	9/7/2010	9/8/2010	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #1	10/27/2010	10/28/2010	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #1	12/2/2010	12/3/2010	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #1	12/18/2010	12/19/2010	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #1	12/26/2010	12/27/2010	Instrument Drift	Manual Calibration	Manual Calibration

CMS Type	Mfg	Process ID	Start Date	Completion Date	Nature & Cause of Malfunction (if any)	Corrective Actions Taken or Preventative Measures Adopted	Nature of Repairs or Adjustments Made to Inoperable or OOC CMS
THC	CAI	Stack monitor #2	12/25/2010	12/27/2010	Instrument Drift	Manual Calibration	Manual Calibration
Dry O2	CAI	Stack monitor #1	12/2/2010	12/3/2010	Instrument Drift	Manual Calibration	Manual Calibration

3. Indicate the total process operating time during the reporting period. (63.10(c)(13))

Total process operating time (days):

Days in reporting period:	184
Facility total process operating time (days):	149.38
Total days on waste:	143.19
Total days on fuels:	6.19

Section IV – Summary Report – Gaseous and Opacity Excess Emissions and CMS Performance

A. Report Date and Submittal Reporting Period

Indicate the reporting period covered by this submittal and the date of this summary report. (63.10(e)(3)(vi))

Reporting Period beginning date	Reporting Period ending date	Summary Report Date
July 1, 2010	December 31, 2010	January 31, 2011

B. Process Description and Monitoring Equipment Information

Complete the following process description and monitoring equipment information table for each affected source process unit:

Total operating time of affected source during the reporting period (days)
206,192 minutes of unit burning/ retaining hazardous waste; 8,909 minutes on virgin fuels.

Process unit name
Rotary Kiln Incineration System

Process unit description
Rotary kiln and ancillary equipment for combustion of hazardous wastes.

Emission and/or operating parameter limitations specified in the relevant standards
See Table 1 and 2 below.

TABLE 1 – APPLICABLE EMISSIONS STANDARDS

Emissions Parameter	Limit	Citation
Destruction and Removal Efficiency (DRE)	≥99.99%	40 CFR 63.1203(c)(1)
PCDDs/PCDFs	≤0.20 ng/dscm TEQ basis	40 CFR 63.1219(a)(1)(i)
HCl/Cl_2	≤ 32 ppmv dry as HCl	40 CFR 63.1219(a)(6)
Mercury	≤ 130 µg/dscm	40 CFR 63.1219(a)(2)
Semi volatile Metals (SVM)	≤ 230 µg/dscm	40 CFR 63.1219(a)(3)
Low Volatile Metals (LVM)	≤ 92 µg/dscm	40 CFR 63.1219(a)(4)
Totals Hydrocarbons	≤ 10 ppmv	40 CFR 63.1219(a)(5)(ii)
Particulate Matter (PM)	≤ 0.013 gr/dscf or 34 mg/dscm	40 CFR 63.1219(a)(7)

TABLE 2 – OPERATING PARAMETERS

On November 18, 2010, Heritage-WTI submitted a Notice of Compliance to EPA that included the operating parameters below. These operating parameters were established through Comprehensive Performance Testing completed on September 16, 2010.

Process Parameter (Tag ID)	Units	Avg. Period	Basis	Limit 10/1/2008 DOC
Minimum Feed Lance Atomization Pressure[1]	Psig	Instant.	Mfg. Rec.	30
Maximum SCC Pressure (PT-4307 & PT-4308)	In. w.c.	Reference September 4,2003 letter from US EPA Region 5 concerning this requirement.		
Maximum Temperature at ESP Inlet (TI-6002A/B)	°F	1-hr	CPT	424
Maximum Pumpable Waste Feed Rate (WQI-9000T)	Lb/hr	1-hr	CPT	29,926
Maximum Total Waste Feed Rate (WQI-9000F)	Lb/hr	1-hr	CPT	35,069
Minimum Kiln Temperature (TI-4300A/B)	°F	1-hr	CPT	1,718
Minimum SCC Temperature (TI-4310A/B)	°F	1-hr	CPT	1,747
Maximum Process Gas Flow rate (FI-7510A/B)	Scfm	1-hr	CPT	67,505
Minimum Loc. 1 Carbon Feed Rate (WI-7003)	Lb/hr	1-hr	CPT	[redacted]
Minimum Loc. 2 Carbon Feed Rate (WI-7002)	Lb/hr	1-hr	CPT	
Minimum Loc. 1 Carbon Feed Pressure (PI-5732)	Psig	1-hr	CPT	3.0
Minimum Loc. 2 Carbon Feed Pressure (PI-7132)	Psig	1-hr	CPT	3.0
Maximum Ash Feed Rate (WQI-9000AH)	Lb/hr	12-hr	CPT	10,333
Minimum Ring Jet Pressure Drop (DPI-7401)	in. w.c.	1-hr	CPT	28.0
Minimum Scrubber (1st and 2nd Packed Bed, combined) Liquid Flow Rate (FQI-7201)	gpm	1-hr	CPT	1,287
Minimum Scrubber (Ring Jet) Liquid Flow Rate (FI-7404A/B)	gpm	1-hr	CPT	446

[1] Each liquid lance has a pressure switch. When the pressure drops below 30 psig on any lance the feed from that lance will be automatically cutoff. Tag Ids : PSL-3113 (High BTU), PSL-3123 (Organic), PSL-3143 (Aqueous), PSL-3133 (Sludge), PSL-3153 (Slurry), and PSL-3100A/B (Sludge 2).

Process Parameter (Tag ID)	Units	Avg. Period	Basis	Limit 10/1/2008 DOC
Minimum Scrubber (Ring Jet) Blowdown (FI-7403)	gpm	1-hr	CPT	19.5
Minimum Scrubber (Ring Jet) Tank Level (LIC-7401)	feet	1-hr	CPT	1.7
ESP Parameters	The ESP is operating with all fields available with set points of 45,000 volts and 90 sparks per minute, each field; and minimum current of 100 milliamps, each field (see US EPA letters dated Dec. 10 and Dec. 27, 2003).			
Minimum Scrubber (1st and 2nd Packed Bed, combined) Feed Pressure	in. w.c.	1-hr	Mfg. Rec.	Not Req'd.
Minimum Scrubber (1st and 2nd Packed Bed) Pressure Drop	in. w.c.	1-hr	Mfg. Rec.	1.3
Minimum Scrubber (3rd Stage) Liquid pH (AI-7307A/B)	pH units	1-hr	Prior Testing	7.6
Maximum Total Chlorine Feed Rate (WQI-9000CL)	Lb/hr	12-hr	Prior Testing	2,032
Maximum Total Semi volatile Metals Feed Rate (WQI-9000SV)	Lb/hr	12-hr	Prior Testing	83.2
Maximum Total Low Volatile Metals Feed Rate (WQI-9000LV)	Lb/hr	12-hr	Prior Testing	400
Maximum Total Pumpable Low Volatile Metals Feed Rate (WQI-9000PLV)	Lb/hr	12-hr	Prior Testing	400
Maximum Total Mercury Feed Rate (WQI-9000M)	lb/hr	12-hr	Prior Testing	0.14
Stack THC (AI-7850)	ppmv	1-hr	Regulatory Requirement	<10

Monitoring Equipment Information

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
ESP Inlet Temperature	**9/28/2010**	Rosemount Transmitter / Thermocouple	Tag # TT-6002A/B (Redundant Instruments)
Kiln Inlet Shroud Pressure	**7/12/2010**	Rosemount Pressure transducer	Tag # PT-4307
Kiln Outlet Shroud Pressure	**10/19/2010**	Rosemount Pressure transducer	Tag # PT-4306
Kiln Temperature	**(A) 4/8/2010** (B) **4/7/2010**	Land CD1 / Laser Thermometer	Tag # TT-4300A/B (Redundant Instruments)
Secondary Combustion Chamber Temperature	**A) 4/7/2010** **B) 2/2/2010**	Land CD1 / Laser Thermometer	Tag # TT-4310A/B Redundant Instruments
Flue Gas Flow Rate (Stack)	**11/10/2010**	United Sciences Ultrasonic Gas Flow	Tag #FT-7805 Used in calculation of Process Flow
Flue Gas Flow Rate (Reheat)	**11/10/2010**	United Sciences Ultrasonic Gas Flow	Tag #FT-7710 Used in calculation of Process Flow
Flue Gas Flow Rate (Scrubber Outlet)	**11/10/2010**	United Sciences Ultrasonic Gas Flow	Tag # FT-7510B This is a redundant instrument for flue gas flow rate. (Redundant with Tag # FI-7510A)
Total Hydrocarbon Analyzer (Stack)	**11/10/2010**	VIG Industries FID (Flame Ionization Detector)	Tag # AI-7850A/B (Redundant Instruments)
Scrubber Ring Jet Liquid Flow Rate	**8/19/2010**	Rosemount Transmitter / Differential Pressure	Tag # FT-7404 A
Scrubber Ring Jet Liquid Flow Rate	**8/19/2010**	Panametrics Ultrasonic Flow	Tag # FT-7404 B
Scrubber First Packed bed flow rate	**8/19/2010**	PolySonics Doppler Flow	Tag # FT-7204 A
Scrubber First Packed bed flow rate	**8/19/2010**	Panametrics Ultrasonic Flow	Tag # FT-7204 B

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
Scrubber Second Packed bed flow rate	**8/19/2010**	PolySonics Doppler Flow	Tag # FT-7304 A
Scrubber Second Packed bed flow rate	**8/19/2010**	Panametrics Ultrasonic Flow	Tag # FT-7304 B
Scrubber Second Packed Bed Liquid PH	**10/1/2010**	Electro-Chemical Devices	Tag # AT-7307A/B
Carbon Feed Rate Loc. 2	**12/11/2010**	Generic Load Cell / Loss in Weight Feeder	Tag # WT-7002
Carbon Feed Rate Loc. 1	**12/11/2010**	Generic Load Cell / Loss in Weight Feeder	Tag # WT-7003
Carbon Carrier Fluid Pressure Loc. 2	**8/9/2010**	Rosemount Transmitter / Pressure	Tag # PT-7132
Carbon Carrier Fluid Pressure Loc. 1	**10/9/2010**	Rosemount Transmitter / Pressure	Tag # PT-5732
High Btu Lance Atomizing Pressure	**9/7/2010**	Generic pressure switch	Tag # PSL-3113
Organic Lance Atomizing Pressure	**9/7/2010**	Generic pressure switch	Tag # PSL-3123
Aqueous Lance Atomizing Pressure	**9/7/2010**	Generic pressure switch	Tag # PSL-3143
Sludge Lance Atomizing Pressure	**9/7/2010**	Generic pressure switch	Tag # PSL-3133
Slurry Lance Atomizing Pressure	**9/7/2010**	Generic pressure switch	Tag # PSL-3153
Sludge 2 Lance Atomizing Pressure	**9/7/2010**	Generic pressure switch	Tag # PSL-3100A/B
Pumpable Hazardous Waste Feed Rate	**8/30/2010**	Micromotion Mass Flow Meter	Tag # FT-3110 High BTU Lance
Pumpable Hazardous Waste Feed Rate	**8/30/2010**	Micromotion Mass Flow Meter	Tag # FT-3120 Organic Lance
Pumpable Hazardous Waste Feed Rate	**8/30/2010**	Micromotion Mass Flow Meter	Tag # FT-3140 Aqueous Lance
Pumpable Hazardous Waste Feed Rate	Not Applicable (calculation)	Positive displacement pump	Tag # FT-3150 Slurry Lance
Pumpable Hazardous Waste Feed Rate	Not Applicable (calculation)	Positive displacement pump	Tag # FT-3130 Sludge Lance
Pumpable Hazardous Waste Feed Rate	**12/11/2010**	Generic Load Cell (Loss in weight calculation)	Tag # WT-3050 Drum Scale A Feeds Multiple Lances
Pumpable Hazardous Waste Feeds	**12/11/2010**	Generic Load Cell (Loss in weight calculation)	Tag # WT-3055 Drum Scale B Feeds Multiple Lances

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
Pumpable Hazardous Waste Feeds	**12/11/2010**	Generic Load Cell. Loss in weight calculation	Tag # WT-3060 Tanker Scale A (South Bay) Feeds Multiple Lances
Pumpable Hazardous Waste Feeds	**12/11/2010**	Generic Load Cell. Loss in weight calculation	Tag # WT-3065 Tanker Scale B (East Bay) Feeds Multiple Lances
Kiln Drum feed Weight Feeder	**12/11/2010**	Generic Load Cell (Scale)	Tag # WT-3081 Front wall Drum Scale
Kiln Bulk Feed Crane	**12/11/2010**	Generic Load Cell (Scale)	Tag # WT-3105 Front wall Crane Scale
Conveyor Scale Drum Processing	**12/11/2010**	Generic Load Cell (Scale)	Tag # WT-3070 Feeds ARTS
Conveyor Scale Monorail Alter	**12/11/2010**	Generic Load Cell (Scale)	Tag # WT-4050 Feeds ARTS
Floor Scale Drum Processing	**12/11/2010**	Generic Load Cell (Scale)	Tag # WT-3075 Feeds ARTS
Floor Scale Drum Processing Lab Pack	**12/11/2010**	Generic Load Cell (Scale)	Tag # WT-3080 Feeds ARTS
Splitting Scale Monorail	**12/11/2010**	Generic Load Cell (Scale)	Tag # WT-3040 Feeds ARTS
Floor Scale Drum Processing - Portable	**12/11/2010**	Generic Load Cell (Scale)	Tag # WT-3076 Feeds ARTS

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
Ring Jet Blow Down	**8/30/2010**	Panametrics Ultrasonic Flow	Tag # FT-7403A/B
Ring Jet Vessel Level	A) **10/26/2010** B) **10/26/2010**	Rosemount Transmitter/ Pressure	Tag # LT-7401A/B
Stack Oxygen Analyzers (wet and dry)	**11/10/2010**	Ametek	Tag # AI-7860A/B (Redundant Instruments)
Ring Jet Differential Pressure	**10/26/2010**	Rosemount Transmitter/ Pressure	Tag # DPT-7405A/B
Scrubber 1st Packed Bed Differential Pressure	**10/1/2010**	Rosemount Transmitter /Pressure transducer	Tag # DPI-7207
Scrubber 2nd Packed Bed Differential Pressure	**10/1/2010**	Rosemount Transmitter /Pressure transducer	Tag # DPI-7307

C. Emission Data Summary

Complete the following emission data summary table for each affected source: (63.10(e)(3)(vi)(l))

Total duration of excess emission / parameter exceedances (minutes for opacity, hours for gases)

Excess Emissions	Total Duration(min)	Total Operating time of affected source during the reporting period (min)	% Of total source operating time during which excess emissions occurred
Maximum Ash Feed Rate (WQI-9000AH)	0	215,101	0.00%
Maximum Process Gas Flowrate (FI-7510A/B)	54.08	215,101	0.03%
Maximum Pumpable Waste Feed Rate (WQI-9000T)	0	215,101	0.00%
Maximum SCC Pressure (PI-4300A/B)	5.13	215,101	0.00%
Maximum Temperature at ESP Inlet (TI-6002A/B)	96.05	215,101	0.04%
Maximum Total Chlorine Feed Rate (WQI-9000CL)	0	215,101	0.00%
Maximum Total Low Volatile Metals Feed Rate (WQI-9000LV)	0	215,101	0.00%
Maximum Total Mercury Feed Rate (WQI-9000M)	0	215,101	0.00%
Maximum Total Pumpable Low Volatile Metals Feed Rate (WQI-9000PLV)	0	215,101	0.00%
Maximum Total Semi volatile Metals Feed Rate (WQI-9000SV)	0	215,101	0.00%
Maximum Total Waste Feed Rate (WQI-9000F)	0	215,101	0.00%
Minimum Feed Lance Atomization Pressure	0	215,101	0.00%
Minimum Kiln Temperature (TI-4300A/B)	1186.63	215,101	0.55%
Minimum Loc. 1 Carbon Feed Pressure (PI-5732)	363.47	215,101	0.17%
Minimum Loc. 2 Carbon Feed Pressure (PI-7132)	305.38	215,101	0.14%
Minimum Loc. 1 Carbon Feed Rate (WI-7003)	270.38	215,101	0.13%
Minimum Loc. 2 Carbon Feed Rate (WI-7002)	46.93	215,101	0.02%
Minimum Ring Jet Pressure Drop (DPI-7401)	670.43	215,101	0.31%

Excess Emissions	Total Duration(min)	Total Operating time of affected source during the reporting period (min)	% Of total source operating time during which excess emissions occurred
Minimum SCC Temperature (TI-4310A/B)	985.48	215,101	0.46%
Minimum Scrubber (1st and 2nd Packed Bed) Pressure Drop	0	215,101	0.00%
Minimum Scrubber (1st and 2nd Packed Bed, combined) Feed Pressure	9.97	215,101	0.00%
Minimum Scrubber (1st and 2nd Packed Bed, combined) Liquid Flow Rate (FQI-7201)	6.92	215,101	0.00%
Minimum Scrubber (3rd Stage) Liquid pH (AI-7307A/B)	217.22	215,101	0.10%
Minimum Scrubber (Ring Jet) Blowdown (FI-7403)	320.43	215,101	0.15%
Minimum Scrubber (Ring Jet) Liquid Flow Rate (FI-7404A/B)	155.78	215,101	0.07%
Minimum Scrubber (Ring Jet) Tank Level (LIC-7401)	16.87	215,101	0.01%
THC	3515.4	215,101	1.63%
ESP Controls	879.96	215,101	0.41%
Total Duration	**9106.51**	**215,101**	**4.23%**

Summary of causes of excess emissions / parameter exceedances (% of total duration by cause):

TYPE	Sum Of Duration	% of Total Duration
Startup/shutdown	2804	30.79%
Control Equipment Problems	3764.47	41.34%
Process Problems	806.8	8.86%
Other unknown causes	443.35	4.87%
Other known causes	1287.90	14.14%
	9106.52	100.00%

D. CMS Performance Summary

Complete the following CMS performance summary table for each affected source: (63.10(e)(3)(vi)(J))

Total duration of CMS downtime[1]
0 minutes

Total operating time of affected source during the reporting period
215,101 min

Percent of total source operating time during which CMS were down
0.00 %

[1] Heritage-WTI, Inc. maintains redundant CMS equipment in most cases to prevent CMS downtime. There were no periods during this time that this redundancy did not prevent CMS downtime.

Summary of causes of CMS downtime (percent of downtime by cause)	
Monitoring equipment malfunctions	0
Non-monitoring equipment malfunctions	0
Quality assurance / quality control calibrations	0
Other known causes	100%
Other unknown causes	0

E. CMS, Process, or Control Changes

1. Have you made any changes in CMS, processes, or controls since the last reporting period?
   ☐ Yes ☒ No (if no, end of form) (63.10(2)(3)(vi)(K))

2. If you answered yes, please describe the changes below:

END OF REPORT